



IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

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MAR 26 2012

U.S. DISTRICT COURT
MID. DIST. TENN.

David B. Todd, III,
Petitioner,

v.

United States of America,
Respondent.

Civil Case No. 3:08-cv-00717

[Criminal Case No. ~~3:00-cr-00090~~]

Senior Judge Wiseman 3:05-cr-00090

MOTION TO ISSUE SUBPOENAS
FOR EVIDENCE OF INNOCENCE

Petitioner, David B. Todd, III, pro se, hereby moves this Honorable Court, for subpoenas to; Charles Schwab and Co., Inc. (Schwab); UBS Financial Services, Inc., (UBS); and Erin Bishop Dunlap, requesting any and all records on their, "Medallion Signature Guarantee", on Aethur and Milas Watkins' replacement stock certificates, including identification/account information who personally appeared before their Medallion members posing as the Watkins. Erin Bishop Dunlap, was employed by "Paine Webber", (now UBS), as Associate Vice President and Vice President, during the time in question here. She would know who their Medallion members were. In addition to that, all parties would know their methods/proceduals process how they verified thier identities of persons who received a Medallion guarantee, including their Medallion guarantee log of these transactions. This information is related to petitioner's criminal conviction, and establishes that no reasonable factfinder